

Exhibit 1

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re:)	Case No. 12-12020 (MG)
)	
RESIDENTIAL CAPITAL, LLC, <u>et al.</u> ,)	Chapter 11
)	
Debtors.)	Jointly Administered
_____)	

**DECLARATION OF LAUREN GRAHAM DELEHEY IN SUPPORT OF THE
STATEMENT OF THE LIQUIDATING TRUST IN CONNECTION
WITH MOTION OF MOVANT YOSEF LE ROI MUSTAFANOS FOR
AN ORDER SHORTENING NOTICE PERIOD FOR CERTAIN
EMERGENCY RELIEF FROM THE AUTOMATIC STAY**

I, Lauren Graham Delehey, hereby declare as follows:

1. I serve as Chief Litigation Counsel for the ResCap Liquidating Trust (the “Liquidating Trust”), and previously served as Chief Litigation Counsel in the legal department at Residential Capital, LLC (“ResCap”), a limited liability company organized under the laws of the state of Delaware and the parent of the other debtors in the above-captioned Chapter 11 Cases (collectively, the “Debtors”).¹ I joined ResCap on August 1, 2011 as in-house litigation counsel.

2. In my role as Chief Litigation Counsel at ResCap, I was responsible for the management of litigation, including residential mortgage-related litigation, class actions, mass actions and multi-district litigation. In connection with ResCap’s chapter 11 filing, I also assisted the Debtors and their professional advisors in connection with the administration of the chapter 11 cases, including the borrower litigation matters pending before this Court. In my

¹ The names of the Debtors in these cases and their respective tax identification numbers are identified on Exhibit 1 to the *Affidavit of James Whitlinger, Chief Financial Officer of Residential Capital, LLC, in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 6], dated May 14, 2012.

current position as Chief Litigation Counsel to the Liquidating Trust, among my other duties, I continue to assist the Liquidating Trust in connection with the claims reconciliation process. I am authorized to submit this declaration (the "Declaration") in support of the *Statement of the Liquidating Trust In Connection with Motion of Movant Yosef Le Roi Mustafanos For an Order Shortening Notice Period For Certain Emergency Relief From the Automatic Stay* (the "Statement").²

3. Except as otherwise indicated, all facts set forth in this Declaration are based upon my personal knowledge of the Debtors' and the Liquidating Trust's operations, information learned from my review of relevant documents and information I have received through my discussions with other former members of the Debtors' and the Liquidating Trust's management or other former employees of the Debtors, and the Debtors' and/or the Liquidating Trust's professionals and consultants. If I were called upon to testify, I could and would testify competently to the facts set forth in the Statement on that basis.

4. As best the Liquidating Trust can discern from the documentation underlying the Mortgage Loan issued to Sgt. Marshall by EverBank, GMACM acted as servicer of the Mortgage Loan from March 3, 2004 to November 2008 when its servicing responsibilities were transferred to Everhome. To the best of my knowledge and belief, GMACM did not act as broker for the Mortgage Loan, and following the transfer of its servicing duties in 2008, GMACM no longer had any involvement with Sgt. Marshall or the Mortgage Loan at issue.

5. I have confirmed with members of the Liquidating Trust's Legal Department and designated service of process handlers ("SOP") in the Liquidating Trust's Legal Department that, to the best of my knowledge, neither GMACM nor ResCap has received service

² Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to such terms in Statement.

of any notice in the Foreclosure Action. Further, neither the complaint nor an amended complaint in the Foreclosure Action was sent to me from any department, outside counsel, or by United States mail. Accordingly, to the best of my knowledge and belief, neither GMACM nor ResCap were served with any notice in the Foreclosure Action. Moreover, no attorney or other representative has appeared on behalf of GMACM or ResCap in the Foreclosure Action.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 3, 2014

/s/ Lauren Graham Delehey
Lauren Graham Delehey
Chief Litigation Counsel for The ResCap
Liquidating Trust